

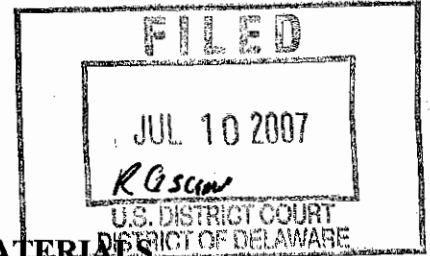
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**JAMES ST. LOUIS,
PLAINTIFF,**

CIV. ACT.NO.:06-236-SLR

V.

**LT. CHERYL MORRIS, ET. AL.,
DEFENDANTS.**



PLAINTIFF'S FIRST REQUEST FOR DISCOVERY MATERIALS

(Pursuant to Rule 34 Fed. R. of Civ. Proc.)

Plaintiff requests that the defendants Lt. Cheryl Morris, Director Chris Klein, Administrator Michael Knight, Lt. Legates, Lt. Lehman, Sgt. Johnson, and Sgt. Boring disclose all initial information and documents the defendants will use to support their defenses, and serve them upon plaintiff within 30 days pursuant to Fed. R. Civ. P. 26(a) (1):

REQUEST NO. 1:

1. Request notice of any deals, promises, promotions, reassignments or inducements made to witnesses or defendants in exchange for testimony.

REQUEST NO. 2:

2. Requesting notice of any immunity given to any defendant for supplying contraband in the form of doughnuts, pizza, fried chicken, lasagna, or any type of food brought in and given to inmates along with income tax forms to fill out and charge inmates for doing their taxes in exchange for testimony.

REQUEST NO. 3:

3. Request notice of any immunity given to defendants or witnesses involved in soliciting individuals to 'encourage' plaintiff to drop the case at hand.

REQUEST NO. 4:

4. Listing job descriptions and duties of kitchen inmate personnel and who does job assignments and duties at the relevant times of this litigation.

REQUEST NO. 5:

5. Names, addresses, and phone numbers of each individual likely to have discovery information that the disclosing party may use to support its claims or defenses, unless solely for impeachment identifying the subjects and information.

REQUEST NO. 6:

6. Copy of or description by category and location of all documents electronically stored information and tangible things that are in the possession, custody or content of the party and that the disclosing party may use to support its claims or defenses unless solely for impeachment.

REQUEST NO. 7:

7. Disclosure of any identities of any person who may be used at trial to present evidence under Rules 702, 703, and/or 705 of the F.R.E.

REQUEST NO. 8:

8. Expert witnesses with a complete statement of all opinions to be expressed and the basis and reason therefore; data or other information considered by the witness in forming the opinion; any exhibits to be used as a summary of or support for the opinions; the qualifications of the witness(es) including a list of all publications authored by the witness within the preceding 10 years compensation to be paid for the study and testimony.

REQUEST NO. 9:

9. Deals, immunity, and promises given anyone during the D.O.C. investigation and report of the solicitation from Sgt. Johnson to inmates to coerce plaintiff to end this subject matter; along with the record filed on these charges by Lt. DeJesus and his investigation/report to the prison.

REQUEST NO. 10:

10. List of insurance company and any relevant policy numbers; also a copy of the policy.

REQUEST NO. 11:

11. List of any and all civil suits in the past 10 years involving any and/or all defendants including the name and location of the court(s), caption(s), outcome(s), disposition of the case(s), and a certified docket sheet for any and all case(s).

REQUEST NO. 12:

12. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, all grievances or complaints submitted by Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between Plaintiff and Department of Correction personnel.

REQUEST NO. 13:

13. All correspondence relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint, including, but not limited to, any correspondence between friends or family members of Defendants or other inmates, and Department of Correction personnel.

REQUEST NO. 14:

14. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in Plaintiff's Complaint and any statements, declarations, or affidavits of Plaintiff, other inmates, or witnesses to the allegations in the Complaint.

REQUEST NO. 15:

15. All criminal history records for all defendants in any State and/or Foreign Country including the State of Delaware.

REQUEST NO. 16:

16. Any and all grievances filed against any of the defendants and/or disciplinary actions by internal investigations, including the type of filing (grievance, write-up from another officer, an internal investigation, etc...), case number(s), outcome(s), disposition(s), and certified documentation as to authenticity.

REQUEST NO. 17:

17. All medical and/or mental health records for all defendants for the past 20 years, including any that were possibly performed while being at a D.O.C. facility unofficially and/or personally.

REQUEST NO. 18:

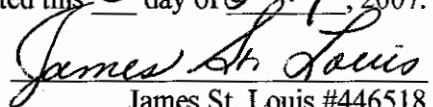
18. Any and all documents directly or indirectly involved with this litigation that the defendants may have in their possession which would be deemed evidence.

REQUEST NO. 19:

19. Any and all document(s) referenced or identified in Plaintiff's Responses to Interrogatories served that may contain different and/or the same information, signatures, personal notes written on them, any investigations performed in connection with this litigation and any and all write-ups filed against plaintiff in connection with this litigation.

REQUEST NO. 20:

20. A complete institutional file including classifications, write-ups, and any information used to make any determinations including presentence reports that the Delaware Department of Corrections has in their possession or had in their possession.

Submitted this 5 day of July, 2007.

James St. Louis #446518
D/E F17B1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, James St. Louis, hereby certify that I have served a true
and correct cop(ies) of the attached: ~~Exhibits~~ interrogatories
and discovery upon the following
parties/person (s):

TO: _____ TO: _____
Deputy Attorney General
Dept of Justice
820 W. French 6th Floor
Wilmington, DE 19801

TO: _____ TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, DE 19977.

On this 5 day of

July, 2007
James St. Louis

IM James St. Louis
SBI# 446518 UNIT Little East
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

WILMINGTON DE 197

09 JUL 2007



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United States District Court
844 N. King St. Dock 15
Wilmington Delaware

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